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Attorneys for Debtors

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:

Case Nos. BK-S-06-10725 LBR

Chapter 11

USA COMMERCIAL MORTGAGE
COMPANY,

**DECLARATION IN SUPPORT OF
MOTION FOR ORDER SHORTENING
TIME TO HEAR MOTION FOR ORDER
GRANTING DEBTOR ADDITIONAL
TIME TO FILE ITS STATEMENTS AND
SCHEDULES**

Debtor.

Date of Hearing: OST REQUESTED
Time of Hearing: OST REQUESTED

Jeanette E. McPherson, Esq. of Schwartz & McPherson Law Firm, attorney for the above
captioned debtor and debtor in possession (collectively "USA" or the "Debtors"), under penalties
of perjury, hereby declares on this 18th day of April, 2006 that:

1 1. A Motion For Order Granting Debtor Additional Time To File Its Statements And
2 Schedules has been filed. This Motion requests that the Court extend the period under Bankruptcy
3 Rule 1007(c) to file its Statements and Schedules for an additional forty-five (45) days, thereby
4 setting the deadline for the Debtor to file its Statements and Schedules to sixty (60) days after the
5 Petition Date.

6 2. Under Bankruptcy Rule 1007(c), the Debtor is required to file their Statements and
7 Schedules within fifteen (15) days after the Petition Date. To prepare the Statements and
8 Schedules in these cases, the Debtor must gather information from books, records and documents
9 relating to hundreds of loans and which involve thousands of investors. The collection of the
10 information necessary to complete the Statements and Schedules will require an expenditure of
11 substantial time and effort on the part of the Debtor's management and employees. Given the size
12 and complexity of the Debtor's business operations, the large number of parties and interests, and
13 its new management, the Debtor needs additional time to file its Statements and Schedules.
14 Cause, therefore, exists to extend the time to file the Debtor's Statements and Schedules.

15 3. No known party opposes hearing the Motion on shortened time.

16 Respectfully submitted this 19th day of April, 2006.

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